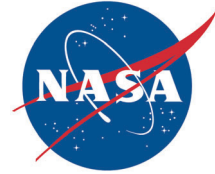


National Aeronautics and Space Administration

**Lyndon B. Johnson Space Center**

2101 NASA Parkway  
Houston, TX 77058-3696



May 19, 2026

Reply to Attn of: AL-26-026

TO: AA/Center Director

FROM: AL/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at Space Walk III

On May 21, 2026, WRX Companies and Capital Factory are sponsoring Space Walk III (SW-3) at Space Center Houston in Houston, Texas from 6:00 pm to 9:00 pm. This event is designed as a community-building gathering to bring together key stakeholders from the commercial space and aerospace sectors, academia, economic development organizations, non-profits, and investors and is intended as a networking opportunity where attendees will mingle and visit “stations” set up by various startup entities to showcase their work. The purpose of the event is to foster collaboration, reinforce a sense of community within the Texas aerospace ecosystem and expand the global economy into aerospace.

The event organizers include WRX Companies and Capital Factory. Financial partners include Intuitive Machines, Microsoft, Dell Technologies, University of Houston-Clear Lake, Rice University, Houston City College and San Jacinto College.

Space Walk III is an invitation-only event, with an expected attendance of approximately 400 to 500 individuals. Attendees will include representatives from companies such as Intuitive Machines, Axiom Space, Venus Aerospace, Firefly Aerospace, Blue Origin, Rhodium Scientific, Aegis Aerospace, Starlab, and others, as well as academic institutions like Texas Southern University, Texas A&M Space Institute, Rice Space Institute, Rice Alliance for Technology and Entrepreneurship, San Jacinto College, University of Houston Clear Lake, and University of Houston Sasakawa Center for Space Architecture. Additionally, members of the BAHEP Aerospace Committee, the Greater Houston Partnership Aerospace Advisory Committee, and various non-profits, investors, and business leaders within the aerospace sector will be in attendance.

NASA employee Vanessa Wyche has been invited by event sponsor, WRX Companies. The event will feature small bites and beverages, including two complimentary drinks (beer, wine,

or soft drinks). The estimated per-person value for food and refreshments is approximately \$45. There are currently no planned gifts or giveaways for attendees, and no fundraising activities will take place in conjunction with the event. While two journalists have been invited to attend in an individual capacity, no formal press coverage is planned or anticipated.

This event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g), as it includes a broad and diverse range of professionals and organizations relevant to NASA's mission and interests. Participation in this event will further NASA's objectives by promoting collaboration, fostering industry relationships, and supporting community engagement. The benefits of NASA's attendance outweigh any potential concerns regarding the acceptance of offered refreshments.

NASA employees who do not have a significant role in a matter affecting the interests of the sponsors may accept an invitation for free attendance for themselves and a guest to the event. In those circumstances, I find that the Agency's interest in attendance outweighs any concern that the individual may be, or may appear to be, improperly influenced in the performance of their duties. Additionally, NASA employees who have a significant role in any pending matter affecting the interests of WRX Companies or Capital Factory, such as procurement duties, program management, or negotiating or administering a Space Act agreement, should seek a separate determination from their local ethics counselor as to whether they may accept the invitation.

**RANDALL  
SURATT**

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Randall T. Suratt

cc:  
HQ/Ethics Team